

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JULIE DALESSIO, an individual,

Plaintiff,

v.

UNIVERSITY OF WASHINGTON,

Defendant.

No.

NOTICE OF REMOVAL

(KING COUNTY SUPERIOR COURT,
CAUSE NO. 17-2-07812-3 SEA)

Pursuant to 28 U.S.C. § 1443, and 28 U.S.C. § 1446, Defendant UNIVERSITY OF WASHINGTON hereby removes the above-entitled action to the United States District Court for the Western District of Washington at Seattle. Defendant states:

1. The above-entitled action was filed in the Superior Court of KING County, Cause No. 17-2-07812-3 SEA. A true and correct copy of the Complaint is attached as Exhibit A.

2. Jurisdiction of this Court is based on 28 U.S.C. § 1331, 28 U.S.C. § 1343, 28 U.S.C. §1367, 28 U.S.C. §1441, and/or 28 U.S.C. §1443.

3. Plaintiff's various claims seek damages arising under the Constitution or laws of the United States as follows:

- a. 45 CFR Parts 160 & 164 (HIPPA) (complaint, ¶5.1(a))
- b. 20 U.S.C. § 1232g(a)(4) and 34 CFR Part 99 (FERPA)(Complaint ¶5.1(a))
- c. 5 U.S.C. § 552(b)(6) (Freedom of Information Act)(FOIA)(Complaint ¶5.1(l))

d. 42 U.S.C. § 2000e (Title VII of the Civil Rights Act)(section 704(a))
(Complaint ¶5.4(d), 7.5)

e. 42 U.S.C. §12101 (Americans with Disabilities Act) (ADA)(Complaint,
¶¶5.4(d), 7.5).

f. 42. U.S.C. §1983 (Complaint, ¶5.4(h), 7.5).

g. 42 U.S.C §1981 (Complaint, ¶5.4(k)).

4. Pursuant to 28 U.S.C. §1446(a), true and correct copies of all pleadings
previously served on Defendant and/or appearing in the superior court docket are attached
to counsel's verification.

5. Defendant reserves any and all affirmative defenses, including but not
limited to insufficient service of process.

DATED: April 24, 2017

KEATING, BUCKLIN & McCORMACK, INC., P.S.

By: /s/ Jayne L. Freeman

Jayne L. Freeman, WSBA #24318

Special Assistant Attorney General for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that on April 24, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Pro-Se Plaintiff

Julie Dalessio
1110 29th Ave.
Seattle, WA 98122
Telephone: (206) 324-2590
Email: juliedalessio@msn.com

and I hereby certify that I have mailed by United States Postal Service, via regular and certified mail, the document to the following non CM/ECF participants:

Pro-Se Plaintiff

Julie Dalessio
1110 29th Ave.
Seattle, WA 98122
Telephone: (206) 324-2590
Email: juliedalessio@msn.com

DATED: April 24, 2017

/s/ Jayne L. Freeman

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